

KING COUNTY SUPERIOR COURT FOR THE STATE OF WASHINGTON

KATINA RUH and GORDON RUH,
individually and as a martial community,

Plaintiffs,

vs.

SAFEWAY, INC., a California corporation,

Defendant.

No.

COMPLAINT FOR DAMAGES

COME NOW the plaintiffs, Katina and Gordon Ruh, by and through their attorneys,
Myers & Company, P.L.L.C., and allege:

I. PARTIES

1.1 Plaintiffs Katina and Gordon Ruh are a martial community.

1.2 Defendant Safeway, Inc. ("Safeway") is a corporation organized under the laws of
the state of California doing business in the State of Washington.

II. JURISDICTION AND VENUE

The acts and omissions giving rise to this cause of action occurred in Seattle, King
County, Washington. Jurisdiction and venue are properly in the King County Superior Court.

III. FACTS

3.1 On June 21, 2021 Katina went to Safeway (located at 7340 35th Ave. NE, Seattle, WA 98115).

3.2 Katina entered the store. As she was walking toward the produce department, she slipped and fell.

3.3 After she got up Katina noticed a wet spot where she had slipped. The store clerk who came over to help commented about the skid mark made by Katina along the wet portion of the floor.

3.4 As a result of the fall Katina suffered personal injuries. Katina and Gordon have suffered economic and non-economic damages.

IV. FIRST CAUSE OF ACTION—NEGLIGENCE

4.1 Katina and Gordon reallege all prior paragraphs.

4.2 Katina was a business invitee.

4.3 Safeway owed a duty to exercise ordinary and reasonable care in maintaining the premises.

4.4 The wet floor constituted a hazardous condition.

4.5 Safeway breached its duty of care by failing to ensure that the floor was reasonably safe for customers and by failing to warn customers about the dangerous condition.

4.6 As a direct and proximate result of Safeway's negligence, Katina has suffered damages in an amount to be determined at trial.

V. SECOND CAUSE OF ACTION—LOSS OF CONSORTIUM

5.1 Katina and Gordon reallege all prior paragraphs.

1 5.2 As a direct and proximate cause of Safeway's acts and omissions Gordon has
2 suffered damages associated with his loss of consortium in an amount to be proven at the time of
3 trial.

4 **VI. PRAYER FOR RELIEF**

5 WHEREFORE having fully set forth their claims against the Defendant, Katina and
6 Gordon pray for relief as follows:

7 A. For monetary judgment in an amount sufficient to compensate them for the
8 damages they have suffered as a result of the described incident;

9 B. For prejudgment interest on all liquidated amounts as allowed by law;

10 C. For their reasonable costs and attorneys' fees incurred herein, pursuant to all
11 applicable statutory, common law, and equitable theories; and

12 D. For such other and further relief as the Court deems just and equitable.

13 DATED this 4th day of May, 2022.

14 MYERS & COMPANY, P.L.L.C.

15 Attorneys for Plaintiffs

16 By: 
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18 Michael David Myers
19 WSBA No. 22486
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